December 10, 2013

William Grant
Deputy Commissioner, Division of Energy Resources
Minnesota Department of Commerce (DOC)
85 7th Place East, Suite 500
Saint Paul, Minnesota 55101-2198

RE: Value of Solar Tariff Draft Methodology

Geronimo Energy hereby submits these comments on the Minnesota Department of Commerce's Value of Solar Tariff Draft Methodology.

Geronimo appreciates the Department's open approach to developing this methodology, and believes that the workshops allowed all parties to gain an understanding of the goals and provided opportunity for stakeholders to express their ideas and opinions. We especially appreciate the goal of creating a transparent process in developing a methodology that can be easily calculated by all parties.

Geronimo's comments regarding various aspects of the draft methodology are below.

I. **Aggregate Production Data:** Actual fleet metered production data should be used. It eliminates uncertainty and provides a transparent way to verify results. Xcel has approximately 1,000 solar systems on its system including several utility grade systems that could provide the initial data. This data could be updated as additional systems are brought online. Modeled production data can be affected by the assumptions used to run the analysis and should be avoided.

II. Load Match Analysis: Geronimo supports the adoption of the Peak Load Reduction methodology using MISO's rule for non-wind intermittent resource accreditation**.** This is due to the fact that the results of an ELCC study are entirely dependent upon the modeling assumptions that are used to perform the analysis. This is evident by the recent October 2013 results of Xcel's ELCC study that have a 10-24% shift from its May 2013 analysis due to a change in modeling data assumptions. Similar to the Strategist software, seemingly small decisions can have dramatic differences in results of the model. Due to the fact that these software systems are expensive and inaccessible to the public and the solar industry, it is in the public interest that the transparency of the peak load reduction method be adopted. It is an easily verifiable method that can be accurately estimated and verified through a simple analysis of the systems production post commercial operation.

III. **Rating Convention:** Geronimo supports a common rating convention that is fair to all system designs. System engineering can dramatically alter a system's energy and capacity accreditation. A common methodology is needed in order to have a discussion on values between parties. This is evident by the various methods used to describe the AC rating between various parties in this docket. An example of this is the Department's use of 72% as the standard derate in the proposed VOS methodology, while Xcel uses an 85% blanket derate as its "effective AC" rating in its ELCC analysis. The seemly insignificant assumption dramatically alters the results and findings of this proceeding and should therefore be provided the strictest of scrutiny when stated as fact. Geronimo reiterates its support of transparent and verifiable inputs for all of the VOS methodology criteria.

Geronimo looks forward to the final methodology and feels that it will fairly value the energy, capacity and ancillary benefits that solar generated power provides.

Regards,

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Geronimo Energy